

EXHIBIT B

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January 19, 2022

VIA E-MAIL
RESTRICTED CONFIDENTIAL – ATTORNEYS’ EYES ONLY

Adam M. Slater, Esquire
Mazie Slater Katz & Freeman, LLC
103 Eisenhower Parkway
Roseland, NJ 07068

Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation
Case No. 1:19-md-02875-RBK-JS

Counsel:

ZHP remains unsuccessful in obtaining the permission of the government of the People’s Republic of China (“PRC”), pursuant to the PRC’s Data Security Law, to export documents located in China that the Court has ordered to be produced. Despite the penalties that might be imposed under Chinese law (as set forth in ZHP’s prior briefing on these issues, which ZHP incorporates by reference), ZHP will be producing the documents that are the subject of Special Master Order No. 54. Please note, however, that although ZHP is in the process of producing those documents, it cannot predict whether the PRC government will intervene to stop their export; accordingly, such production is subject to that possibility.

The documents that are the subject of Plaintiffs’ pending motion for sanctions are among those that ZHP is in the process of exporting, and will be produced on a rolling basis. Accordingly, we request that Plaintiffs withdraw that portion of the motion that relates to ZHP’s document production.

Very truly yours,



Jessica Priselac

Duane Morris

January 19, 2022

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cc: Seth A. Goldberg (*via email*)
Rachel M. Good (*via email*)
Plaintiffs' Executive Committee (*via email*)